

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

April 13, 2022

VIA ECF

The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn,

The Plaintiffs' Executive Committees write to respectfully request a very brief extension to respond to the (non-discovery) motions for costs and fees filed by the Kingdom of Saudi Arabia and Dallah Avco, on Friday, April 8, 2022 (ECF No. 7852) and Monday, April 11, 2022 (ECF No. 7871), respectively, in connection with the deposition hearing of Alp Kali originally scheduled for March 22, 2022, in Istanbul Turkey. Plaintiffs' replies would be due on Friday, April 15, 2022, and Monday, April 18, 2022.

Without objection from either the Kingdom or Dallah Avco, Plaintiffs respectfully request that the Court adjust the due date for both Plaintiffs' replies to Tuesday, April 19, 2022. Plaintiffs anticipate filing a single joint response to both motions. Plaintiffs make their request in light of the Passover and Easter holidays and the need to coordinate with Plaintiffs' counsel in Turkey.

April 13, 2022

Page 2

Respectfully submitted,

COZEN O'CONNOR

/s/ Sean P. Carter, Esquire

Sean P. Carter, Esquire
1650 Market Street, Suite 2800
Philadelphia, PA 19103

MDL 1570 Plaintiffs' Exec. Committee
for Commercial Claims

KREINDLER & KREINDLER

/s/ Andrew J. Maloney, Esquire

Andrew J. Maloney, Esquire
485 Lexington Avenue, 28th Fl.
New York, NY 10017

MDL 1570 Plaintiffs' Exec. Committee for
Personal Injury and Death Claims

MOTLEY RICE

/s/ Robert T. Haefele, Esquire

Robert T. Haefele, Esquire
28 Bridgeside Boulevard
Mt. Pleasant, SC 29464

MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims

cc: All counsel by ECF